UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

Case No. 2:19-CR-00092-01

STIPULATED MOTION TO CONTINUE CHANGE OF PLEA HEARING

Defendant Veronica Lewis, through counsel, respectfully requests that the change of plea hearing currently scheduled for January 13, 2021 be continued for three weeks. The government agrees with this requested continuance.

On January 5, 2021, the parties filed the plea agreement in this case. *See* Doc. 56. The plea agreement states that the agreement is contingent on Ms. Lewis entering a plea agreement with the State of Vermont in which she pleads guilty to Attempted Second Degree Murder. *Id.* at ¶ 13. The federal plea agreement anticipates that the state court plea agreement be finalized before entry of the guilty plea in federal court.

On January 7, 2021, counsel learned that Ms. Lewis' state court counsel and counsel for the Vermont Attorney General's office were in the process of making some changes to the state court plea agreement. As a result, the final version has not yet been signed by all parties. Counsel anticipates that the state court plea agreement will be finalized and signed by all parties within the next three weeks. Accordingly, to comply with the provisions of the federal plea agreement, the parties jointly request that the change of plea hearing be continued for three weeks.

WHEREFORE, Veronica Lewis respectfully requests that the Court grant the Stipulated Motion to Continue Change of Plea Hearing for three weeks.

Dated: January 12, 2021

MICHAEL L. DESAUTELS FEDERAL PUBLIC DEFENDER

By: /s/ David L. McColgin
David L. McColgin
Assistant Federal Public Defender
126 College Street, Suite 410
Burlington, Vermont 05401
(802) 862-6990
Counsel for Veronica Lewis